

# Great Western Painting

## Process Safety Management/Contractor Responsibilities

### Process Safety Management

Process safety management of highly hazardous chemicals. - 1910.119

List of highly hazardous chemicals, toxics and reactives. – 1910.119 App A

Block flow diagram and simplified process flow diagram. – 1910.119 App B

Compliance guidelines and recommendations for process safety management. -  
1910.119 App C

Sources of further information. – 1910.119 App D

The importance of safety can never be overemphasized. In normal work situations, failure to follow a safety procedure may result in a minor abrasion or, at worst, a fatality. However, when working in a facility that has process safety management of highly hazardous chemicals, failure to follow a safety procedure may result in catastrophic release of toxic, reactive, flammable, or explosive chemicals resulting in devastating consequences to an entire workplace or even an entire community. How serious can failure to establish and maintain a process safety management of highly hazardous chemicals be? On December 3, 1984, a poisonous gas leak at a Union Carbide factory in Bhopal, India, killed 16,000 persons and injured an additional 500,000.

The purpose of process safety management is to follow established requirements for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals. These releases may result in toxic, fire or explosion hazards.

The standard that addresses process safety management, 29 CFR 1910.119, *Process Safety Management of Highly Hazardous Chemicals*, can be accessed above and all employees who will be working in a facility which falls under its provisions are to read, at a minimum, paragraph (h) and Appendix C of this standard.

### **Our Responsibilities as a Contract Employer:**

As a contract employer, we shall:

1. assure that each of our employees is trained in the work practices necessary to safely perform his/her job.
2. assure that each of our employees is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.
3. document that each of our employees has received and understood the training required by this 29 CFR 1910.119(h).

- a. A training record will be prepared which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training.
  - b. Training will include all items pertinent to the operating procedures prepared by the employer.
4. per **29 CFR 1910(h)(3)(iv)**, assure, through evaluation of the safety performance of each of our employees, that the safety rules developed by the employer for whom we are working (contractor) are met. This would include those required by **29 CFR 1910.119(f)(4)** which include safety work practices for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel. These safe work practices apply to employees and contractor employees.
  5. advise the employer of any unique hazards presented by our work, or of any hazards found by the our work.

While hazard communication is important on any job site, it is especially important when working in a process safety management situation. Material Safety Data Sheets (MSDS) will be on hand for all chemical products we use and we will, as part of sharing of information, request to see the facility's MSDS for chemicals they are using in the area of the facility in which we are working. These MSDS will not only be present, they must be read prior to work activities.

The Safety Director or other competent person will inform our employees of the known potential fire, explosion or toxic release hazards related to their job and the process and the applicable provisions of the emergency action plan.

Per paragraph (h)(2), 29 CFR 1910.119, the facility for which we are working will provide our employees the known potential fire, explosion, or toxic release hazards related to our work and the process and explain the applicable provisions of their emergency action plan such as escape routes, procedures to account for employees, means of reporting emergencies, and alarm system.

All employees are to respect the confidentiality of trade secret information when the process safety information is released to them.

While our Hot Work Permit has the provisions of 29 CFR 1910.252(a) printed with it, we will not do any hot work without a Hot Work Permit issued by the facility for which we are working. The provisions of 29 CFR 1910.252(a) must be complied with during these operations. Employees performing hot work operations will be provided a copy of **29 CFR 1910.252(a)**.

While the provisions of our specific OSHA compliance programs will be essentially the same as those of the facility for which we are working (i.e., Control of Hazardous Energy, Permit-Required Confined Space, opening process equipment or piping and controls over entrance to facility, etc.), we will follow the provisions of the facility programs when they are applicable to our work.

The supervisor or competent person will advise the facility of any unique hazards presented by our work or any hazards found by our employees.

The supervisor or competent person will immediately report all accidents, injuries, and near misses and an incident investigation must be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained for 5 years.

All the safety provisions, policies, and procedures contained in our safety program are applicable to work with a facility utilizing process safety management of highly hazardous chemicals. Additionally, our employees will abide by the safe work practices developed by the facility for which we are working.

The safety program administrator will assure that each employee is properly trained in the work practices necessary to perform his/her job.

The safety director will document that our employees understand the training required by paragraph (h), 29 CFR 1910.119, using our Process Safety Management Training Record.

### **Management of Change:**

Management of change applies to the following:

1. A process which involves a chemical at or above the specified threshold quantities listed in Appendix A to 29 CFR 1910.119.
2. A process which involves a flammable liquid or gas on site in one location, in a quantity of 10,000 pounds (4535.9 kg) or more.

**Note: Flammable gas means:**

- a. A gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less; or
- b. A gas that, at ambient temperature and pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit;

**Flammable liquid means:**

- a. Any liquid having a flashpoint below 100 deg. F (37.8 deg. C), except any mixture having components with flashpoints of 100 deg. F (37.8 deg. C) or higher, the total of which make up 99 percent or more of the total volume of the mixture.
3. Flammable liquids stored in atmospheric tanks or transferred which are kept below their normal boiling point without benefit of chilling or refrigeration.

4. Hydrocarbon fuels used solely for workplace consumption as a fuel (e.g., propane used for comfort heating, gasoline for vehicle refueling), if such fuels **are part of a process** containing another highly hazardous chemical covered by 29 CFR 1910.119.

Management of change does not apply to:

1. Hydrocarbon fuels used solely for workplace consumption as a fuel (e.g., propane used for comfort heating, gasoline for vehicle refueling), if such fuels **are not a part of a process** containing another highly hazardous chemical covered by 29 CFR 1910.119.
2. Oil or gas well drilling or servicing operations; or,
3. Normally unoccupied remote facilities.

The **employer for whom we are working** will establish and implement written procedures to manage changes to process chemicals, technology, equipment, and procedures; and, changes to their facilities that affect a covered process.

The procedures developed by the employer for whom we are working will assure that the following considerations are addressed prior to any change:

1. The technical basis for the proposed change.
2. Impact of change on safety and health.
3. Modifications to operating procedures.
4. Necessary time period for the change.
5. Authorization requirements for the proposed change.

If our employees are involved in operating a process and maintenance and our employees' job tasks will be affected by the change in the process, the company for whom we are working, must inform our employees of, and train them in, the change prior to start-up of the process or affected part of the process.

If the above changes result in a change in the process safety information required to be provided to our employees, the updated process safety information will be provided to our employees by the company for whom we are working.

If the above changes result in a change in the operating procedures or practices, such procedures or practices shall be updated accordingly.